IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

COUNCIL ON AMERICAN-ISLAMIC RELATIONS – MINNESOTA AND LEAGUE OF WOMEN VOTERS OF MINNESOTA,

Civil Action No. 0:20-cv-02195

Plaintiffs,

v.

ATLAS AEGIS LLC, ANTHONY CAUDLE, JOHN DOES #1-10,

Defendants.

[PROPOSED] TEMPORARY RESTRAINING ORDER

The above-captioned matter came before this Court on October ______, 2020 on Plaintiffs Council on American-Islamic Relations – Minnesota and League of Women Voters of Minnesota's ("Plaintiffs") Motion for Temporary Restraining Order and Preliminary Injunction to enjoin Defendants Atlas Aegis LLC and Anthony Caudle ("Defendants"). Julia Dayton Klein, Esq. of Lathrop GPM LLP appeared for and on behalf of the Plaintiff. ______ of _____ appeared for and on behalf of the Defendants.

The Court finds that a temporary restraining order is warranted and will, therefore, grant Plaintiff's motion in part and temporarily enjoin Defendants.

ORDER

Based on the foregoing, and all the files, records, and proceedings herein, IT IS
HEREBY ORDERED that Plaintiffs Motion for Temporary Restraining Order and
Preliminary Injunction is GRANTED IN PART as follows:

| 1. | All parties shall appear before this Court in Room ata/pm, on the |
|---|--|
| day of _ | for a hearing on Plaintiff's Motion for a Preliminary |
| Injunction. | |
| 2. | Papers in opposition to Plaintiff's Motion for a Preliminary Injunction, if |
| any, shall be filed and served via ECF on or before | |
| 3. | Reply papers on Plaintiff's Motion for a Preliminary Injunction, if any, |
| shall be filed | and served via ECF on or before |
| 4. | Pending the outcome of the hearing on Plaintiff's Motion for a Preliminary |
| Injunction, a | temporary restraining order is hereby entered against Defendants, as |
| follows: | |
| a. | Defendants shall be temporarily ENJOINED from: (a) deploying armed agents within 2,500 feet of Minnesota polling places or otherwise monitor Minnesota polling places during the 2020 election; (b) threatening to deploy armed agents to Minnesota polling places; and (c) otherwise intimidating, threatening, or coercing voters in connection with voting activities in Minnesota; and |
| b. | Each Defendant shall, within 24 hours of receiving this Order, shall provide Plaintiffs' counsel with all available names, telephone numbers, email and mailing addresses of John Does #1-10, by sending them by electronic mail to Julia Dayton Klein at julia.daytonklein@lathropgpm.com. |
| 5. | At this time, a bond is not required pursuant to Federal Rule of Civil |
| Procedure 65(c). | |
| Date: October, 2020 | |
| | Judge Nancy Brasel United States District Court |